

James F. Halley, OSB 91175
JAMES F. HALLEY, P.C.
The Strowbridge Building
735 SW First Ave., 2nd Floor
Portland, OR 97204
503/295-0301; 503/228-6551 (fax)
jimhalley@halleylaw.com

The Honorable Michael H. Simon

Attorney for Plaintiff Riley Poor

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

RILEY POOR,
Plaintiff,

vs.

FRONTIER AIR LINES, Inc.,
Defendant.

No. 3:13-cv-00107-SI

JOINT MOTION FOR MODIFICATION
OF PRETRIAL DATES

I. RULE 7-1(a)(1)(A) CERTIFICATION.

The parties have conferred pursuant to Rule 7-1(a)(1)(A) and join in the following motion for modification of the pretrial dates.

II. MOTION FOR MODIFICATION OF PRETRIAL DATES.

The parties jointly move for a second modification of the pretrial dates as shown below. The parties continue to exchange written discovery, and the plaintiff's deposition has been taken. Additional written discovery has yet to be produced by both sides, and depositions of the defendant's agents are being scheduled. The parties expect that the modification of dates outlined below will permit the efficient conclusion of document production and depositions, and for those reasons the parties ask that the court adjust the pretrial schedule as follows.

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DATES

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James F. Halley, P.C.
Attorney At Law
The Strowbridge Bldg. • 735 S.W. First Ave., 2d. Floor
Portland, OR 97204-3326
Tel: (503) 295-0301 Fax: (503) 228-6551
jimhalley@halleylaw.com

Event	Current Date	Proposed New Date
Fact Discovery Closes	September 30, 2013	November 29, 2013
Plaintiff's Expert Disclosure Due	October 27, 2013	December 6, 2013
Defendant's Expert Witness Disclosure and Reports Due	December 27, 2013	February 25, 2014
Plaintiff's Rebuttal Expert Disclosure and Reports Due	January 27, 2014	March 28, 2014
Joint Status Report Due	February 10, 2014	April 11, 2014
Dispositive Motions Due	February 10, 2014	April 11, 2014

Respectfully submitted September 30, 2013

BRIAN T. MAYE
/s/ Brian T. Maye
 Brian T. Maye (*Pro Hac Vice*)
 Adler Murphy & McQuillen LLP
 Of Attorneys for Defendant Frontier Air
 Lines, Inc.

JAMES F. HALLEY, P.C.
/s/ James F. Halley
 James F. Halley, OSB #91-175
 Trial Attorney for Plaintiff Riley Poor

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2013, I served the attached JOINT MOTION FOR MODIFICATION OF PRETRIAL DATES on:

Brian T. Maye
ADLER MURPHY & McQUILLEN LLP
20 S. Clark, Suite 2500
Chicago, Illinois 60603

Timothy E. Miller
Stuart W. Smith
Miller & Associates
15005 S.W. Meadows Road, Suite 405
Lake Oswego, OR 97035

by ____ having deposited in the United States Mail at Portland, Oregon a full, true and correct copy in a sealed envelope with postage prepaid, addressed as shown above, the last known address for the addressees listed;

by ____ having hand delivered to the attorneys shown above a full, true, and correct copy of the original.

by ☒ electronic filing.

/s James F. Halley
James F. Halley, OSB #91175

The foregoing is a true, correct and complete copy of the original.

James F. Halley, OSB #91175

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